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ANNE GOODWIN CRUMP\*  
VINCENT J. CURTIS, JR.  
PAUL J. FELDMAN\*  
RICHARD HILDRETH  
EDWARD W. HUMMERS, JR.  
FRANK R. JAZZO  
KATHRYN A. KLEIMAN  
BARRY LAMBERGMAN  
PATRICIA A. MAHONEY  
M. VERONICA PASTOR\*  
GEORGE PETRUTSAS  
LEONARD R. RAISH  
JAMES P. RILEY  
MARVIN ROSENBERG  
LONNA M. THOMPSON  
KATHLEEN VICTORY\*  
HOWARD M. WEISS  
\*NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH

ATTORNEYS AT LAW  
11th FLOOR, 1300 NORTH 17th STREET  
ROSSLYN, VIRGINIA 22209

P. O. BOX 33847  
WASHINGTON, D.C. 20033-0847

(703) 812-0400

TELECOPIER

(703) 812-0488

April 6, 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
PAUL D.P. SPEARMAN  
(1939-1982)  
FRANK ROBERSON  
(1936-1981)  
RUSSELL ROWELL  
EDWARD F. KENEHAN  
ROBERT L. HEALD  
FRANK U. FLETCHER

OF COUNSEL  
EDWARD A. CAINE\*

SPECIAL COUNSEL  
CHARLES H. KENNEDY\*

WRITER'S NUMBER  
(703) 812-

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: MM Docket No. 91-221

Dear Mr. Caton:

On behalf of various clients of this firm, there are transmitted herewith an original and four copies of Joint Comments Regarding Request For Prompt Resolution Of Rulemaking Proceeding in connection with the above-noted proceeding.

Also enclosed is a Document Index Term Sheet referencing the above-noted MM Docket.

If further information is necessary, please communicate with this office.

Very truly yours,

  
Vincent J. Curtis, Jr.

VJC:mah  
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

In the Matter of )  
 )  
Review of the Commission's ) MM DOCKET NO. 91-221  
Regulations Governing )  
Television Broadcasting )

Directed to: The Commission

**JOINT COMMENTS REGARDING  
REQUEST FOR PROMPT RESOLUTION OF RULEMAKING PROCEEDING**

Galloway Media, Inc., Associated Broadcasters, Inc., Love Broadcasting Company, Capitol Broadcasting Company, KADN Broadcasting, Inc., Delta Management Company, Fant Broadcasting Company of Nebraska, Inc., Fant Broadcasting Company of Ohio, Inc., WNAL-TV, Inc., Greenville Television, Inc., and San Diego Television, Inc. ("Joint Commenters"),<sup>1</sup> by their attorneys,

<sup>1</sup>Galloway Media is the licensee of Station WGMB, Baton Rouge, Louisiana; Associated Broadcasters, Inc. is the licensee of Stations KWKT(TV), Waco, Texas, KPEJ(TV), Odessa, Texas, and KVEO(TV), Brownsville, Texas; Love Broadcasting Company is the licensee of WLOX-TV, Biloxi, Mississippi; Capitol Broadcasting Company is the licensee of WRAL-TV, Raleigh, North Carolina, KADN Broadcasting, Inc. is the licensee of Station KADN(TV), Lafayette, Louisiana; Delta Management Company is the licensee of Station WNTZ-TV, Natchez, Mississippi; Fant Broadcasting Company of Nebraska, Inc. is the licensee of Stations KGHI-TV, Kearney, KSNB-TV, Superior, KWNB-TV, Hayes Center, Nebraska; Fant Broadcasting Company of Ohio, Inc. is the licensee of Station WWAT(TV), Chillicothe, Ohio; WNAL-TV, Inc. is the licensee of Station WNAL-TV, Gadsden, Alabama, Greenville Television, Inc. is the licensee of Station WXVT-TV, Greenville, Mississippi; and San

hereby respectfully submit their joint Comments regarding the "Request for Prompt Resolution of Rulemaking Proceeding of Benedek Broadcasting Corporation, Chronicle Broadcasting Company, Lin Broadcasting Corporation, Midwest Television, Inc., Paducah Newspapers, Inc., Post-Newsweek Stations, Inc., Providence Journal Company, and The Spartan Radiocasting Company," ("Benedek et al.") submitted February 24, 1994, with regard to the above-captioned matter. With respect thereto, the following is submitted:

Joint Commenters, who are all television station licensees or permittees, concur in the request for prompt resolution of the Commission's rulemaking proceeding which commenced with its Notice of Proposed Rule Making, Review of the Commission's Regulations Governing Television Broadcasting, 7 FCC Rcd 4111 (1992) (the "NPRM".) As the Commission recognizes in the NPRM, the time has come for the Commission to reconsider the obsolete ownership policies that impair competition and make no economic sense today. Instead of increasing diversity of views, the multiple ownership and duopoly rules impair competition in the modern television market and threaten the economic viability of weaker UHF stations.<sup>2</sup> Moreover, both rules seriously compromise

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Diego Television, Inc., debtor-in-possession, is the licensee of Station KTTY(TV), San Diego, California.

<sup>2</sup>Joint Commenters are television station licensees and permittees in smaller markets. Fant Broadcasting Company of Nebraska, Inc. and Fant Broadcasting Company of Ohio, Inc., are television newcomers. Therefore, they are particularly affected by the ownership rules and are in an excellent position to comment on their effects. A large number of other television

the ability of broadcasters to participate in the National Information Infrastructure (the "NII".) The Commission should act immediately to ensure that broadcasters and their viewers are not left behind as the NII develops.

**I. OWNERSHIP LIMITATIONS HAVE LOST THEIR PURPOSE**

The Commission's rules limit to twelve the number of television stations that a party may control. The duopoly rule prohibits ownership of more than one television station in a market. Originally, these prohibitions sought to ensure that every television viewer would have access to a diversity of viewpoints, and they were based on the assumption that different ownership would result in beneficial competition between stations for advertising dollars and audience shares. Today, however, with the introduction of competition from multichannel media such as cable, many free over the air television stations are struggling merely to survive. As pointed out in the NPRM, in 1989, at least 25% of stations in the top ten markets experienced losses, and many weaker UHF stations have been forced off the air altogether by economic failure. NPRM at 4112. As Commissioner

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broadcasters cannot even afford to get involved in this proceeding, as their revenues make it difficult for them to obtain the necessary legal assistance. Thus, contrary to recent reports, Broadcasting & Cable, April 4, 1994, p.36, this proceeding does not concern just large broadcasters and networks that are interested solely in the question of national ownership limits. The local question, and how smaller television stations will be able to compete in the future world of NII, is very much the focus of this proceeding and of vital importance to all broadcasters.

James Quello has said on numerous occasions, the backbone of the concept of free, over the air broadcasting rests in local programming. The economic impact and financial losses suffered by television broadcasters can only have a detrimental effect on local services.

At the same time, diversity of viewpoints is ensured by the sheer number of channels available to the public. Sixty percent of all television households subscribe to cable, and more than half of American households receive at least thirty channels of programming. Id. Thus, viewpoint diversity could not possibly be compromised by allowing a television licensee to own more than twelve television stations nationwide, two stations with overlapping Grade B contours, or stations in different services in the same market. In fact, eliminating or increasing the numerical ownership limits or permitting ownership of more than one station in the market would result in increased programming diversity as broadcasters use their leverage with advertisers and programmers to acquire programming targeted at smaller sections of their audience. In this context, it makes sense to relax the ownership limits and permit operating arrangements to ensure the economic viability of stations and to preserve the very diversity whose quest was at the origin of the policies.

## **II. THE OWNERSHIP RULES HAVE ANTICOMPETITIVE EFFECTS**

The numerical limit rule and the duopoly rule place television licensees at a disadvantage vis a vis cable

programmers. There are no restrictions on the number of channels a programmer may occupy, nor to the audience share it may reach. Thus, cable programmers enjoy significant economies of scale and scope, and they gain leverage in their negotiations with advertisers because they are able to reach more than one segment of the local population. It is tremendously unfair to artificially deprive broadcasters of the same competitive opportunities. As the Commission has recognized, the decrease in broadcasting revenues and audience shares is directly linked to the increased availability of cable. NPRM at 4112. The future advent of Direct Satellite Broadcasting ("DBS") and Video Dialtone ("VDT") can only add to this situation. Broadcasters need immediate relief in the form of relaxed ownership rules that permit them to make rational decisions regarding ownership and programming that make economic sense and aid their survival.

### **III. THE OWNERSHIP RULES HINDER BROADCASTERS' PARTICIPATION IN THE NII**

In a time when building the national information infrastructure (NII) has become a national priority, it is senseless and unfair to prevent television licensees from participating by artificially and uneconomically limiting to twelve the total number of stations they may own nationwide, and to one the number of stations they may own in a market. These ownership limitations place television licensees at a substantial economic disadvantage with respect to the other players in the

NII who are free to combine their resources and often enjoy two streams of revenue. The Commission should act now to provide broadcasters with a more level playing field before their chance to participate in the NII has passed. As pointed out by Assistant Secretary of Commerce and Administrator of the National Telecommunications and Information Administration Larry Irving, "[b]roadcasters remain the principal source of free, universally available electronic information in the United States, and it is important to ensure full participation by that industry in the NII."<sup>3</sup> Over-the-air television is currently the only truly universal service. It is also the only information service that is delivered to its audience free of charge, and the only medium with a public interest mandate. If indeed "[f]ree universal broadcasting is the most valuable asset this democracy possesses and must be allotted highest priority in any future communications transmission highway",<sup>4</sup> it is time for the FCC to give broadcasters the key to their own survival by allowing them to compete with other media on a more equal footing by significantly relaxing the numerical limits and the duopoly rule.

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<sup>3</sup>Hearings before the House Subcommittee on Economic and Commercial Law, 103rd Cong., 2d Sess. (statement of Larry Irving, U.S. Department of Commerce) (January 26, 1994.)

<sup>4</sup>Remarks by Commissioner James H. Quello before the FCBA, Washington, D.C., March 17, 1994.

#### **IV. THE COMMISSION SHOULD ACT NOW**

By issuing the NPRM, the Commission recognized the need to reform its numerical ownership rules and duopoly rules. The NPRM was issued almost two years ago. Since then, Chairman Hundt<sup>5</sup> and Commissioners Barrett and Quello have voiced their support for changes in these rules.<sup>6</sup> Both Congress and the Administration have also clearly indicated their support for a revision of these rules in order to facilitate participation by broadcasters in the NII. Two telecommunications bills are pending before the House, and one is pending before the Senate.<sup>7</sup>

The Senate bill specifically instructs the Commission to revise the television ownership restrictions on broadcasters. The original Markey-Fields bill made no mention of ownership limits relaxation. However, in a recent compromise amendment, the Bill was modified to direct the Commission to revisit its ownership rules.

The Hollings-Danforth Bill specifically directs the Commission "to modify or remove such national and local ownership rules ... on television broadcast stations as are necessary to ensure that broadcasters are able to compete fairly with other

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<sup>5</sup>Communications Daily, March 21, 1994, p.1.

<sup>6</sup>Broadcasting & Cable, March 28, 1994, p.32.

<sup>7</sup>These three bills are: S. 1822, 103d Cong. 2d Sess. (1994) ("Hollings-Danforth Bill"); H.R. 3626, 103d Cong., 1st Sess. (1993) ("Brooks-Dingell Bill"); H.R. 3636, 103d Cong., 1st Sess. (1993) ("Markey-Fields Bill").



media providers while ensuring that the public receives information from a diversity of media sources." Hollings-Danforth Bill at 103. At the same time, the current Administration has voiced its support for a modification of the current ownership restrictions placed on broadcasters. Assistant Secretary of Commerce Larry Irving recently underscored that the Administration supports review of the ownership rules by the Commission as a way of "removing unnecessary and artificial barriers to participation by private firms in all communications markets while making sure that consumers remain protected and interconnected."<sup>8</sup> In the current atmosphere of support for these reforms, it makes sense for the Commission to act without delay. Moreover, broadcasters urgently need the relief a relaxation of those rules would provide to enable them to participate in the NII on an equal footing with other media and preserve the tradition of universal service and public affairs service they represent.

#### **CONCLUSION**

Joint Commenters fully support the Request for Prompt Resolution of Rulemaking Proceeding of Benedek et al. submitted to the Commission February 24, 1994. The current ownership rules are outdated, and they restrict competition rather than promoting it. In addition, the rules constitute a barrier to the entry of broadcasters into the NII. Moreover, Congress the Administration

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<sup>8</sup>Statement of Larry Irving, see supra, fn. 2.

and a number of Commissioners themselves have indicated that the time has come to relax those rules. Consequently, Joint Commenters join Benedek et al. in respectfully requesting that the Commission act without delay to relax the numerical limit and duopoly rules in accordance with the NPRM.

Respectfully submitted,

GALLOWAY MEDIA, INC.  
WGMB(TV), New Orleans, Louisiana

ASSOCIATED BROADCASTERS, INC.  
KVEO(TV), Brownsville, Texas  
KPEJ(TV), Odessa, Texas  
KWKT(TV), Waco, Texas

LOVE BROADCASTING COMPANY  
WLOX-TV, Biloxi, Mississippi

CAPITOL BROADCASTING COMPANY  
WRAL-TV, Raleigh, North Carolina

KADN BROADCASTING, INC.  
KADN(TV), Lafayette, Louisiana

DELTA MANAGEMENT COMPANY  
WNTZ(TV), Natchez, Mississippi

FANT BROADCASTING COMPANY  
OF NEBRASKA, INC.  
KGHI-TV, Kearney, Nebraska  
KSNB-TV, Superior, Nebraska  
KWNB-TV, Hayes Center, Nebraska

FANT BROADCASTING COMPANY OF OHIO, INC.  
WWAT(TV), Chillicothe, Ohio

WNAL-TV, INC.  
WNAL-TV, Gadsden, Alabama

GREENVILLE TELEVISION, INC.  
WXVT-TV, Greenville, Mississippi

SAN DIEGO TELEVISION, INC.  
DEBTOR-IN-POSSESSION  
KTTY(TV), San Diego, California

By: M. Veronica Pastor  
Vincent J. Curtis, Jr.  
M. Veronica Pastor

Their Attorneys

FLETCHER, HEALD & HILDRETH  
11th Floor  
1300 North 17th Street  
Rosslyn, Virginia 22209  
(703) 812-0400

April 6, 1994

MVP/#1/tvown.cmt

**CERTIFICATE OF SERVICE**

I, Delphine I. Davis, a secretary in the law firm of Fletcher, Heald & Hildreth do hereby certify that true copies of the foregoing "JOINT COMMENTS REGARDING REQUEST FOR PROMPT RESOLUTION OF RULEMAKING PROCEEDING" were sent this 6th day of April, 1994, by first-class United States mail, postage prepaid, to the following:

Mr. Merrill Spiegel\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

Ms. Maureen O'Connell\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

Mr. Byron F. Marchant\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 826  
Washington, D.C. 20554

Mr. William E. Kennard\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 614  
Washington, D.C. 20554

Mr. Roy J. Stewart\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 314  
Washington, D.C. 20554

Robert J. Rini, Esq.  
Rini & Coran, P.C.  
1350 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036  
Counsel for Morgan Murphy Stations

**\*By Hand**

Martin P. Messinger, Esq.  
Vice-President & Sr. Chief Counsel  
Westinghouse Broadcasting Co., Inc.  
888 Seventh Avenue  
New York, N.Y. 10106

Stephen A. Hildebrandt, Esq.  
Chief Counsel  
Westinghouse Broadcasting Co., Inc.  
400 North Capitol St., N.W.  
Suite 500  
Washington, D.C. 20001-1511

Ramsey L. Woodworth, Esquire  
Wilkes, Artis, Hedrick & Lane  
1666 K Street, N.W.  
Washington, D.C. 20006  
Counsel for Westinghouse Broadcasting Co., Inc.

Reed Miller, Esquire  
Arnold & Porter  
1200 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
Counsel for Marion TV, Inc.

Colby M. May, Esq.  
May & Dunne, Chartered  
1000 Thomas Jefferson St., N.W.  
Suite 520  
Washington, D.C. 20007  
Counsel for Trinity Christian Center  
of Santa Ana, Inc. d/b/a Trinity  
Broadcasting Network

Mr. Myron Jones  
Chief Executive Officer  
The Jet Broadcasting Co., Inc.  
1635 Ash Street  
Erie, PA 16503

John M. Schohl, Esq.  
Secretary & General Counsel  
Malrite Communications Group, Inc.  
800 Skylight Office Tower  
Cleveland, OH 44115

Mr. Allen P. Allweiss  
Executive Vice President  
Home Shopping Network, Inc.  
P.O. Box 9090  
Clearwater, FL 34618-9090

James J. Popham, Esq.  
Vice President, General Counsel  
Association of Independent  
Television Stations, Inc.  
1200 18th Street, N.W.  
Suite 502  
Washington, D.C. 20036

Mr. M. David Detweiler, IV  
Chief Executive Office  
Commonwealth Communications  
Services, Inc.  
3300 N. Sixth Street  
Box 1505  
Harrisburg, PA 17105

Dennis P. Corbett, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006  
Counsel for WKRG-TV, Inc.  
& WEVY, Inc.

Norman P. Leventhal, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006  
Counsel for Paramount Stations  
Group Inc.

Mr. Cyril E. Vetter  
Chief Executive Officer  
Vetter Communications Co., Inc.  
5220 Essen Lane  
Baton Rouge, LA 70809

Mark E. Chopko, Esq.  
General Counsel  
United States Catholic Conference  
3211 Fourth Street, N.W.  
Washington, D.C. 20017

Peter H. Doyle, Esq.  
Arter & Hadden  
1801 K Street, N.W.  
Suite 400K  
Washington, D.C. 20006  
Counsel for ABRY Communications

Nathaniel F. Emmons, Esq.  
Mullin, Rhyne, Emmons & Topel, P.C.  
1000 Connecticut Avenue  
Suite 500  
Washington, D.C. 20036  
Counsel for Buck Owens Production  
Company, Inc.

Harry F. Cole, Esq.  
Bechtel & Cole, Chartered  
1901 L Street, N.W.  
Suite 250  
Washington, D.C. 20036  
Counsel for Press Broadcasting Co., Inc.

Anthony L. Pharr, Esq.  
2000 M Street, N.W.  
Suite 400  
Washington, D.C. 20036  
Counsel for the Office of Communication  
of the United Church of Christ

Mr. Alden F. Abbott, Esq.  
Chief Counsel  
National Telecommunications &  
Information Administration  
U.S. Department of Commerce  
14th Street & Constitution Ave., N.W.  
Room 4713  
Washington, D.C. 20230

Blackburn & Company, Inc.  
201 N. Union Street  
Suite 340  
Alexandria, VA 22314

Gigi B. Sohn, Esq.  
Media Access Project  
2000 M Street, N.W.  
Washington, D.C. 20036  
Counsel for TRAC/WACCI-VCR

Henry L. Baumann, Esq.  
Executive Vice-President  
& General Counsel  
National Association of Broadcasters  
1771 N Street, N.W.  
Washington, D.C. 20036-2891

Mr. Don West  
Broadcasting Magazine  
1705 DeSales Street, N.W.  
Washington, D.C. 20036

Mr. K. James Yager  
Executive Vice President  
Benedek Broadcasting Corporation  
Stewart Squire Bldg.  
308 West State Street  
Suite 210  
Rockford, Illinois 61101

Ms. Amy McCombs  
President & CEO  
Chronicle Broadcasting Co.  
1001 Van Ness Avenue  
San Francisco, CA 94109

Mr. Gary R. Chapman  
President  
Roberta R. Katz, Esq.  
Mr. Paul Karpowicz  
LIN Television Corporation  
4 Richmond Square  
Providence, Rhode Island 02906  
[all w/enclosure]

Mr. August C. Meyer, Jr.  
President  
Mr. Jack B. Everette  
Elisabeth M. Kimmel, Esq.  
Midwest Television, Inc.  
P.O. Box 20  
Champaign, Illinois 61824-0200  
[all w/enclosure]

Mr. J. Fred Paxton  
President  
Paducah Newspapers, Inc.  
P.O. Box 1197  
Paducah, Kentucky 42002-1197

Robert E. Branson, Esq.  
Vice President, Legal Affairs  
Mr. G. William Ryan  
Diana M. Daniels, Esq.  
Post-Newsweek Stations, Inc.  
1150 Fifteenth St., N.W.  
Washington, D.C. 20071  
[all w/enclosure]

William S. Reyer, Jr., Esq.  
Hogan & Hartson  
Columbia Square  
555 Thirteenth St., N.W.  
Washington, D.C. 20036  
Counsel for Fox Broadcasting  
Company



Joel H. Levy, Esq.  
Cohn & Marks  
1333 New Hampshire Ave., N.W.  
Suite 600  
Washington, D.C. 20036  
Counsel for KFVE Joint Venture

Mr. David D. Smith  
President  
Sinclair Broadcast Group, Inc.  
2000 West 41st Street  
Baltimore, MD 21211-1420

Mr. John Behnke  
Chairman of the Board  
Fisher Broadcasting Inc.  
100 Fourth Avenue North  
Seattle, WA 98109

Kristin C. Gerlach, Esq.  
Senior General Attorney  
Law & Regulation  
77 West 66th Street  
New York, N.Y. 10023  
Counsel for Capital Cities/ABC, Inc.

Donald D. Wear, Jr., Esq.  
Attorney at Law  
1776 K Street, N.W.  
Washington, D.C. 20006  
Counsel for ACT III Broadcasting, Inc.

Mr. Doug Halonen  
Electronic Media  
529 Fourteenth Street, N.W.  
Washington, D.C. 20045

Kenneth E. Satten, Esq.  
Wilkinson Barker, Knauer & Quinn  
1735 New York Ave., N.W.  
Washington, D.C. 20006  
Counsel for WJAC, Inc.

Mr. Bruce A. York  
National Executive Director  
American Federal of Television  
& Radio Artists  
5480 Wisconsin Ave.  
Suite 201  
Chevy Chase, MD 20815

Wade H. Hargrove, Esq.  
Tharrington, Smith & Hargrove  
209 Fayetteville Street Mall  
P.O. Box 1151  
Raleigh, N.C. 27602

Mr. Tack Nail  
Communications Daily  
Warren Publishing, Inc.  
2115 Ward Court, N.W.  
Washington, D.C. 20037

Michael B. Isaacs, Esq.  
Director of Government Affairs  
& Public Policy  
Mr. John Hayes  
Providence Journal Co.  
75 Fountain Street  
Providence, Rhode Island 02902  
[all w/enclosure]

Mr. Nick W. Evans, Jr.  
President  
The Spartan Radiocasting Co.  
P.O. Box 1717  
Spartanburg, South Carolina 29304-1717

Ellen Goodman, Esq.  
Covington & Burling  
1201 Pennsylvania Ave., N.W.  
Washington, D.C. 20044  
Counsel for Benedek Broadcasting Corp.,  
Chronicle Broadcasting Co., Lin Broadcasting Corp.,  
Midwest Television, Inc., Paducah Newspaper, Inc.,  
Post-Newsweek Stations, Inc., Providence Journal Co.,  
& the Spartan Radiocasting Co.

  
Delphine I. Davis

**Applicants/Petitioners**

Galloway Media, Inc., Associated Broadcasters, Inc., Love Broadcasting Company, Capitol Broadcasting Company, KADN Broadcasting, Inc., Delta Management Company, Fant Broadcasting Company of Nebraska, Inc., Fant Broadcasting Company of Ohio, Inc., WNAL-TV, Inc., Greenville Television, Inc., and San Diego Television, Inc.

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